

MICHAEL N. FEUER, City Attorney (SBN 111529)  
VALERIE L. FLORES, Managing Ass't City Atty (SBN 138572)  
BETHELWEL WILSON, Deputy City Atty (SBN 251805)  
OFFICE OF THE CITY ATTORNEY  
200 North Main Street, Room 800, City Hall East  
Los Angeles, CA 90012-4131  
Telephone: (213) 978-7100  
Email: bethelwel.wilson@lacity.org

Attorneys for Respondent  
City of Los Angeles

**FEE EXEMPT—Gov. Code § 6103**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

ADRIAN RISKIN, an Individual;

Petitioner,  
vs.

CITY OF LOS ANGELES, a Charter City and  
Municipal Corporation; and DOES 1 THROUGH  
, INCLUSIVE,

Respondents.

**CASE NO. 19STCP05266**

**DECLARATION OF BRIAN O'CONNOR  
IN SUPPORT OF OPPOSITION TO  
PETITION FOR WRIT OF MANDATE**

**Date: November 11, 2020**

**Time: 1:30**

**Dept.: 85**

**Judge: Honorable James C. Chalfant**

I, Brian O'Connor, declare as follows

1. I am a Lieutenant (Serial #35408) with the Los Angeles Police Department (LAPD).  
I make this declaration based upon my own personal knowledge and if called upon I would competently  
testify under the penalty of perjury, as follows:

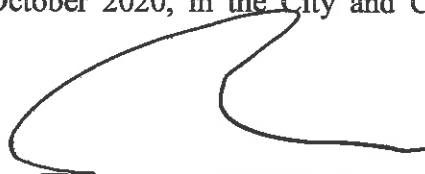
2. For the past two years, I have been assigned to LAPD Legal Affairs Division. From  
September 2018 to July 2020, I was assigned as the Officer-in-Charge (OIC) of Legal Affairs Division,  
Discovery Section, where I supervised the processing of all CPRA requests directed to LAPD. I am

1 currently the OIC of the Legal Affairs Division, Employment Litigation Section; however, I remain  
2 currently knowledgeable of all aspects of Discovery Section's CPRA processing operations. The current  
3 OIC of Discovery Section is Lieutenant Marla Ciuffetelli, Serial No. 34964.

4 3. In my capacity as the OIC of the Discovery Section, I became acquainted with Petitioner  
5 as a chronic requester who submits CPRA requests to LAPD that are purposefully overbroad and unduly  
6 burdensome. While the number of requests Petitioner submits varies, there has been an occasion where  
7 Petitioner has submitted at least 15 CPRA requests to LAPD in a single day (July 20, 2020), and a  
8 30-day period where Petitioner has submitted at least 50 CPRA requests to LAPD (July 15, 2020, to  
9 August 15, 2020). Petitioner has also personated several Department employees by submitting CPRA  
10 requests in their names without their knowledge or consent. Additionally, Discovery Section staff  
11 recently conducted a search of Department CPRA processing records which revealed that between  
12 July 1, 2019, and October 15, 2020, Petitioner submitted at least 275 CPRA requests to LAPD using at  
13 least 30 different aliases. As of October 22, 2020, Petitioner has approximately 75 open CPRA requests  
14 to LAPD.

15 4. On August 6, 2020, the Department sent a letter to Petitioner explaining the new  
16 procedure by which LAPD would process his numerous CPRA requests. A true and correct copy of said  
17 letter is attached hereto as **Exhibit A**.

18 5. I declare under penalty of perjury under the laws of California that the foregoing is true  
19 and correct. Executed on this 22nd day of October 2020, in the City and County of Los Angeles,  
20 California.

21 

22 BRIAN O'CONNOR, Declarant  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE -- (VIA VARIOUS METHODS)**  
**CASE NO. 19STCP00818**

I, the undersigned, say: I am over the age of 18 years and not a party to the within action or proceeding. My business address is 200 North Main Street, Suite 800, Los Angeles, California 90012.

On, October , 2020 I served the foregoing documents described as: **Opposition to Petition for Writ of Mandate** on all interested parties in this action by placing copies thereof enclosed in a sealed envelope addressed as follows:

[ ] BY MAIL - I deposited such envelope in the mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing in affidavit; and/ or

[ ] BY PERSONAL SERVICE - (☐) I delivered by hand, or (☐) I caused to be delivered via messenger service, such envelope to the offices of the addressee with delivery time prior to 5:00 p.m. on the date specified above.

[ ] BY OVERNIGHT COURIER - I deposited such envelope in a regularly maintained overnight courier parcel receptacle prior to the time listed thereon for pick-up. Hand delivery was guaranteed by the next business day.

[X] BY ELECTRONIC SERVICE: Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury that the foregoing is true and correct. Executed on March , 2019, at Los Angeles, California.